

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

MILISSA JONES)	
)	
)	
Plaintiff,)	
)	
v.)	2:07 CV273-WKW
)	
FLYING J, INC.)	
)	<u>Unopposed</u>
Defendant.)	

PLAINTIFF’S UNOPPOSED MOTION TO EXTEND

_____The Plaintiff moves the Court for entry of an Order extending the deadline by which she must file any opposition to the Defendant’s Motion for Summary Judgment by 7 (seven) days on the following grounds:

1. The present deadline by which the Plaintiff must file her opposition to the Defendant’s motion for summary judgment is January 7, 2008.
2. Counsel for the Plaintiff is a solo practitioner who does not employ a secretary and has several conflicts in other cases within the several days surrounding the instant deadline.
3. In addition, the undersigned was unable to keep regular office hours for the months of November and December 2007 due to a family medical

emergency, resulting in an unusually full calendar of appointments and deadlines for January and February, 2008, further necessitating this motion..

4. The extension sought by this motion (including any presumably accompanying extension by which the Defendant's reply brief would be due) would not delay or otherwise affect any pre-trial or trial deadline previously set in this case.
5. The extension sought would not prejudice the Defendant in any way and counsel for the Defendant has informed the undersigned that the Defendant does not oppose this motion.

WHEREFORE, the Plaintiff respectfully requests entry of an Order granting this motion and extending the deadline by which she must file any opposition to the Defendant's motion for summary judgement by 7 (seven) days or until January 14, 2008.

Respectfully submitted,

s/Adam P. Morel

Adam P. Morel

ATTORNEY FOR THE PLAINTIFF

OF COUNSEL:

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been served
via electronic filing to:

All Attorneys of Record

This the 3rd day of January, 2008.

s/Adam P. Morel

OF COUNSEL